REMARKS

The Examiner is thanked for the careful review of this Application. Claims 22-28 have been cancelled. Claims 1, 2, 9, 10, 14, 15, and 18-21 have been amended. No new matter has been added. Claims 1-21 are pending after entry of this Proposed Amendment. Claims 1-21 stand rejected.

Rejections under 35 USC §103

Claims 1-28 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Babin* (U.S. 6,411,517) in view of *Kurek, III* (U.S. 6, 394,509). The rejection is traversed, and Applicants request reconsideration.

The Examiner is thanked for the phone interview on November 06, 2006. The focus of the phone interview was independent claim 1. In the phone conversations, the undersigned pointed out that *Babin* does not teach using vertical and horizontal clocked gears with vertical and horizontal rack gears to actuate movement in two substantially perpendicular directions. Although *Kurek III* teaches clocked gears, *Kurek III* does not teach vertical and horizontal clocked gears meshing with vertical and horizontal rack gears to actuate movement in two substantially perpendicular directions. The clock gears of *Kurek III* only enable movement in one dimension. The Examiner agreed that neither *Babin* nor *Kurek III* teaches vertical and horizontal clocked gears meshing with vertical and horizontal rack gears to actuate movement in two substantially perpendicular directions. The undersigned proposed to amend independent claim 1. The Examiner suggests bringing the differentiating elements of the clocked gears and rack gears from claim 2 into claim 1. Independent claims 1, 9, 14, 18, and 20 have been amended per suggestions from the Examiner.

Regarding amended independent claim 1, *Babin* teaches a system 22 for removably connecting a circuit card 54 to an electronic device, which comprises a sliding component 28, a guiding edge 32 a channel 26, a connector 20, and a lever 40. The circuit card 54 is mounted on the sliding component 28. Once the sliding component 28 is fully inserted with the recesses 58 in register with the connection sockets (or connector) 20, the lever 40 is manually pivoted downwardly to a locked position wherein the auxiliary plate 34 is lowered until suitable connection is made between the circuit card and the connector 20. (*See*, Figures 2 and 5-7, and their accompanying description) *Babin* does not teach "a vertical rack gear on the component collar," "a horizontal rack gear on the component collar," "a vertical

clocked gear in the clocked gear assembly," and "a horizontal clocked gear in the clocked assembly, wherein the vertical clocked gear is designed to engage the vertical rack gear and the horizontal clocked gear is designed to engage the horizontal rack gear to enable movement of the component collar in at least two substantially perpendicular directions to actively enable the component," as defined in claim 1. *Babin* teaches that the sliding component 28 is horizontal moved until the recess 58 is substantially in register with the connection socket 20. Afterwards, the actuating lever 40 is manually pivoted downwardly. (*See*, col. 6, lines 18-21) In contrast, the vertical clocked gear 134a and the vertical rack gear 146 of the present invention are designed to mesh together to enable the downward movement of the component collar until the component collar 120 seats in the frame 122. When the component collar 120 seats in the frame 122, the horizontal rack gear 144 engage the horizontal clocked gear 134b to horizontally move the component device 102 on the component collar 120 to seat into power and data connector 152. When the horizontal gears engage, the vertical gears disengage simultaneously. (*See*, paragraphs 46 and 47) The design of the clocked gears and the rack gears enable the simultaneous engagement of the horizontal gears to enable the horizontal movement and the disengagement of the vertical gears to disenable the vertical movement. *Babin*'s design does not allow simultaneous enabling of the horizontal movement and the disenabling of the vertical movement. *Babin* does not teach rack gears or a clocked gear assembly with clocked gears.

Kurek, III teaches a latch for installing and removing a disk drive from an enclosure. The latch comprises an actuator (or level, 40, 140), which includes a pair of pinions (or clocked gears, 42, 142) in meshing engagement with teeth on the guiding members (14,16) for moving the disk drive in a linear direction (60, or opposite direction 64). (*See*, abstract, Figures 1-3, and their accompanying description) The pair of pinions (or gears) (42, 142) described by *Kurek, III* only enable movement in one direction (60) and does not enable the movement of any component "in at least two substantially perpendicular directions," as defined in claim 1. In addition, *Kurek, III* does not teach "the vertical clocked gear is designed to engage the vertical rack gear and the horizontal clocked gear is designed to engage the horizontal rack gear to enable movement of the component collar in at least two substantially perpendicular directions to actively enable the component," as defined in claim 1. Clocked gears 42 of *Kurek III* vertically meshes with gears on block 44 to move the disk drive vertically (or direction 60) only, not in two directions. (*See*, abstract and col. 3, lines 57-60) In contrast, claim 1 defines that the vertical clocked gear engages with the vertical

rack gear and the horizontal clocked gear engages with the horizontal rack gear to move in at least two substantially perpendicular directions.

Babin and *Kurek, III*, the references as combined, do not teach all the features of the claim 1. Therefore, Applicants submit that claim 1 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Regarding claim 2, claim 2 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 2 is patentable over *Babin* in view of *Kurek, III*. In addition, neither *Babin* nor *Kurek III* teaches "a lever for controlling the vertical clocked gear and the horizontal clocked gear, wherein the vertical rack gear meshes with the vertical clocked gear to enable movement of the component collar in a first direction and the horizontal rack gear meshes with the horizontal clocked gear to enable movement of the component collar in a second direction, the first direction and the second direction being substantially perpendicular" as described in claim 2. The level of claim 1 controls vertical and horizontal clocked gears to mesh with the vertical and horizontal rack gears, respectively, to move the component collars in two substantially perpendicular directions.

The level 40 of *Babin* does not control clocked gears. The level 40 of *Kurek III* only controls the clocked gears 42 of vertically meshes with gears on block 44 to move the disk drive in one direction (vertically, or direction 60) only, not in two substantially perpendicular directions. (*See*, abstract and col. 3, lines 57-60) The design of clock gears 42 with gears on block 44 of *Kurek III* does not allow movement of the disk drive in more than one direction. Therefore, *Babin* and *Kurek, III* as combined do not teach all the features of the claim 2. As a consequence, Applicants submit that claim 2 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Regarding claim 3, claim 3 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 3 is patentable over *Babin* in view of *Kurek, III*.

Regarding claim 4, claim 4 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 4 is patentable over *Babin* in view of *Kurek, III*. In addition, neither *Babin* nor *Kurek, III* teaches "the lever includes a first pin to engage the vertical clocked gear, the vertical clocked gear having a first slot for receiving the first pin, and the lever includes a second pin to engage the horizontal clocked gear, the horizontal clocked gear having a second slot for receiving the second

pin," as defined in claim 4. The pin 22 of *Kurek, III* is a guide support that extends from an outer surface of each of the guide members 14, 16 proximate the second end. Pin 22 does not engage either the vertical clocked gear or horizontal clocked gear. Pin 41 of *Kurek, III* helps to attach lever 40 to block 44. Pin 41 also does not engage either the vertical clocked gear or horizontal clocked gear. Therefore, *Babin* and *Kurek, III* as combined do not teach all the features of the claim 4. The case of obviousness is not established. As a consequence, Applicants submit that claim 4 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Regarding claim 5, claim 5 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 5 is patentable over *Babin* in view of *Kurek, III*. In addition, neither *Babin* nor *Kurek, III* teaches "movement of the lever through a first segment of the arc causes the first pin to engage the first slot to move the vertical clocked gear and movement of the lever through a second segment of the arc causes the second pin to engage the second slot to move the horizontal clocked gear," as defined in claim 5. As described above, pins 22 and 41 do not engage either the vertical clocked gear or horizontal clocked gear. Therefore, *Babin* and *Kurek, III* as combined do not teach all the features of the claim 5. The case of obviousness is not established. As a consequence, Applicants submit that claim 5 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Regarding claim 6, claim 6 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 6 is patentable over *Babin* in view of *Kurek, III*. . In addition, neither *Babin* nor *Kurek, III* teaches "the first pin disengages from the first slot and the second pin engages the second slot at a cross-over point," as defined in claim 6. *Kurek, III* does not teach pin 22 disengaging from the first slot and pin 41 engaging the second slot at a cross-over point. As a matter of fact, *Kurek, III* does not teach a cross-over point. Therefore, *Babin* and *Kurek, III* as combined do not teach all the features of the claim 6. As a consequence, Applicants submit that claim 6 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Regarding claim 7, claim 7 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 7 is patentable over *Babin* in view of *Kurek, III*. . In addition, neither *Babin* nor *Kurek, III* teaches "the arc is defined by approximately 90 degrees, the first segment being defined by approximately 45 degrees and the second segment being defined by approximately 45 degrees," as defined in claim

7. *Kurek, III* teaches the lever (or handle) 40 is rotated between an open position shown in FIG. 3 and a dosed position, for example, generally 90.degree.-180.degree. from its closed position, which is illustrated in dotted lines. (*See*, column 3, lines 53-56) *Kurek, III* does not teach the first and second segments being approximately 45 degrees. Therefore, *Babin* and *Kurek, III* as combined do not teach all the features of the claim 8. As a consequence, Applicants submit that claim 8 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Regarding claim 8, claim 8 is a dependent claim of independent claim 1. Based on the argument described above for claim 1, claim 8 is patentable over *Babin* in view of *Kurek, III.* In addition, neither *Babin* nor *Kurek, III* teaches "movement of the component in a first direction is configured to enable insertion of the component device into an array of component devices and movement of the component in a second direction is configured to enable connection of the component to a board connector," as defined in claim 8. Component 12 of *Kurek, III* is a disk drive support. *Kurek, III* does not teach the disk drive support 12 is being inserted into an array of component devices. *Kurek, III* also does not teach board connector. The Examiner's characterization of disk drive support 12 is incorrect. Therefore, *Babin* and *Kurek, III* as combined do not teach all the features of the claim 8. As a consequence, Applicants submit that claim 8 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Regarding amended independent claim 9, based on similar arguments for independent claim 1, *Babin* and *Kurek III*, alone or in combination, do not teach "the component collar having a first rack gear and a second rack gear," and "the clock gear assembling having a first clocked gear and a second clocked gear, the first clocked gear designed to effect movement of the component collar in a first direction upon initial engagement with the first rack gear of the component mounting frame, and the second clocked gear designed to effect movement of the component collar in a second direction upon release of the first clocked gear by first rack gear and engagement of the second rack gear to the second clocked gear," as defined in claim 9. Therefore, Applicants submit that claim 9 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Claims 10-13 are dependent claim of independent claim 9. Based on the argument described above for claim 9, Applicants submit that claims 10-13 are patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of their rejections.

Regarding amended independent claim 14, based on similar arguments for independent claim 1, *Babin* and *Kurek III*, alone or in combination, do not teach "the component collar having a first rack gear and a second rack gear," and "a clocked gear assembly having a vertical clocked gear and a horizontal clocked gear, the vertical rack gear meshed with the vertical clocked gear to effect movement of the computer component in a first direction and the horizontal rack gear meshes with the horizontal clocked gear to effect movement of the component in a second direction, wherein the computer component mounting device provides for positioning the computer component in the first direction and in the second direction, and the second direction is substantially perpendicular to the first direction. Therefore, Applicants submit that claim 14 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Claims 15-17 are dependent claim of independent claim 14. Based on the argument described above for claim 14, Applicants submit that claims 15-17 are patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of their rejections.

Regarding amended independent claim 18, based on similar arguments for independent claim 1, *Babin* and *Kurek III*, alone or in combination, do not teach "the computer device collar having a vertical rack gear and a horizontal rack gear," and "a clocked gear assembly having a vertical clocked gear and a horizontal clocked gear capable of positioning the computer device in a first direction upon engagement of the vertical clocked gear with the vertical rack gear and positioning the computer device in a second direction upon release of the engagement of the vertical clocked gear with the vertical rack gear and engagement of the horizontal clocked gear with the horizontal rack gear, wherein the second direction is substantially perpendicular to the first direction," as defined in claim 18. Therefore, Applicants submit that claim 18 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Claim 19 is a dependent claim of independent claim 18. Based on the argument described above for claim 18, Applicants submit that claim 19 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Regarding amended independent claim 20, based on similar arguments for independent claim 1, *Babin* and *Kurek III*, alone or in combination, do not teach "a clocked gear assembly having a vertical clocked gear and a horizontal clocked gear", and "the device collar having a vertical rack gear and a horizontal rack gear, wherein the

vertical rack gear meshes with the vertical clocked gear to move the storage device in a first direction and the horizontal rack gear meshes with the horizontal clocked gear to move the storage in a second direction substantially perpendicular to the first direction," as defined in claim 20. Therefore, Applicants submit that claim 19 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

Claim 21 is a dependent claim of independent claim 20. Based on the argument described above for claim 20, Applicants submit that claim 21 is patentable over *Babin* in view of *Kurek, III*, and request the withdrawal of its rejection.

In consequence, Applicants respectfully request withdrawal of the rejection to claims 1-21. Applicants request that claims 1-21 be indicated to be allowable. A notice of allowance is respectfully requested. If the Examiner has any questions concerning the present amendment, the Examiner is kindly requested to contact the undersigned at (408) 774-6924. If any other fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP355). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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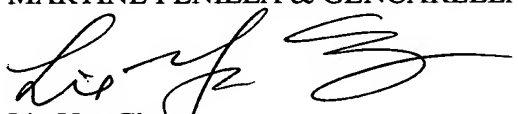

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